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March 22, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080

Dear Judge Martinotti:

On behalf of the parties, we submit the following bi-weekly status report:

1. The parties have continued their progress on MTD proposals.
  - a. For third party payors, the parties have connected regarding a proposal. The TPPs are conferring among themselves and will be approaching Defendants shortly with their proposal.
  - b. For self-funded payers, the parties have agreed on cases to brief and are working out other details such as timetable and page length. The parties will submit a proposed order shortly memorializing the agreements.
  - c. For the States, the parties have agreed to cases to brief and are working out other details such as timetable and page length. The parties will submit a proposed order shortly memorializing the agreements.
2. Plaintiffs have been making progress on Defendants' draft discovery plan.
3. Both parties will be making their submissions on the disputed portions of the ESI Protocol to Magistrate Judge Singh today.
4. Defendants are reviewing the self-funded-payer plaintiffs' direct-filing order and expect to provide any edits shortly.

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Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi

James E. Cecchi

*Liaison Counsel for*

*Third-Party Payer Track*

/s/ Joanne Cicala

Joanne Cicala

*Liaison Counsel for*

*The State Attorneys General Track*

/s/ David R. Buchanan

David R. Buchanan

*Liaison Counsel for*

*Self-Funded Payer Track*

/s/ John D. Tortorella

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cc: All counsel of record